

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MRUGU CHAMPANERI,

Plaintiff,

V.

**GROUP LONG TERM DISABILITY PLAN
FOR EMPLOYEES OF ALLSTATE
INSURANCE COMPANY,**

Defendant.

Case No. 08-C-3895

Judge Kennelly

**GROUP LONG TERM DISABILITY PLAN FOR EMPLOYEES OF
ALLSTATE INSURANCE COMPANY'S
AGREED MOTION FOR AN INITIAL EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD**

Defendant, GROUP LONG TERM DISABILITY PLAN FOR EMPLOYEES OF ALLSTATE INSURANCE COMPANY (“ALLSTATE” Plan) by its attorneys, Donald A. Murday and Michael B. Galibois of Chittenden, Murday & Novotny LLC, hereby moves for an extension of time to answer or otherwise plead to Plaintiff’s First Amended Complaint. In support of its Agreed Motion, the ALLSTATE Plan states:

1. This action was initially filed on July 9, 2008. Service of summons was completed on July 11, 2008. Under the present schedule, the ALLSTATE Plan's responsive pleading is due July 31, 2008.

2. Plaintiff's First Amended Complaint seeks recovery under ERISA of alleged additional long term disability benefits under the ALLSTATE Plan.

3. Counsel for the ALLSTATE Plan has been recently retained and requires an additional period of time in which to review the administrative record in order to evaluate Plaintiff's claims and file a good faith responsive pleading.

4. Prior to filing this Agreed Motion, counsel for the ALLSTATE Plan contacted counsel for Plaintiff, who advised that he has no objection to the ALLSTATE Plan's request for a thirty (30) day extension of time in which to file its responsive pleading.

5. Accordingly, the ALLSTATE Plan respectfully requests through September 1, 2008 in which to answer or otherwise plead to Plaintiff's First Amended Complaint.

6. This Agreed Motion is not brought to unnecessarily delay these proceedings or to prejudice any parties to this litigation.

WHEREFORE, Defendant GROUP LONG TERM DISABILITY PLAN FOR EMPLOYEES OF ALLSATE INSURANCE COMPANY respectfully requests that this Court enter an order extending the time within which it must answer or otherwise plead to Plaintiff's First Amended Complaint until September 1, 2008.

Respectfully submitted,

By: /s/ Michael B. Galibois
Counsel for Defendant
**GROUP LONG TERM DISABILITY PLAN
FOR EMPLOYEES OF ALLSATE
INSURANCE COMPANY**

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